

Stephen J. Obermeier
202.719.7465
sobermeier@wiley.law



Wiley Rein LLP
2050 M Street NW
Washington, DC 20036
Tel: 202.719.7000

wiley.law

APPLICATION GRANTED
SO ORDERED

July 11, 2022

VIA ECF FILING

7/11/22 
John G. Koeltl, U.S.D.J.

Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Comcast Cable Commc'ns, LLC v. Mission Broadcasting, Inc.*, Case No. 1:21-cv-06860

Dear Judge Koeltl:

Pursuant to Rule VI.A.2 of Your Honor's Individual Practices, Third-Party Defendant Mission Broadcasting, Inc. ("Mission") respectfully moves to permanently seal the unredacted version of the Memorandum of Law in Support of Plaintiff and Counterclaim Defendant Nexstar's Motion to Dismiss Comcast's Counterclaim ("Nexstar's Brief," ECF No. 92) and certain Mission-related exhibits appended to the Declaration of Kevin Hoogstraten (the "Exhibits," ECF Nos. 93.4, 93.5).

Nexstar's Brief and Exhibits contain references to, verbatim quotations from, and a complete copy of a confidential Retransmission Consent Agreement between Comcast and Mission (the "Mission-Comcast RCA") and associated confidential correspondence. As Mission has explained in prior motions to seal, Comcast and Mission agreed to maintain the strict confidentiality of the Mission-Comcast RCA, which contains highly confidential business and competitive information that is not generally known in the market. *See, e.g.*, ECF No. 59.

On May 24, 2022, this Court granted Mission's motion and entered an Order permanently sealing the portions of Comcast's Third-Party Complaint and Answer and Counterclaim referencing and/or quoting from the Mission-Comcast RCA. *See* ECF No. 64. Because Nexstar's Brief and Exhibits likewise reference and quote from the Mission-Comcast RCA, Mission requests that the corresponding redacted and sealed portions of Nexstar's Brief and Exhibits remain permanently sealed.

Mission has met and conferred with both Nexstar and Comcast, and neither opposes this letter-motion. Accordingly, Mission hereby requests that the Court permit (i) the unredacted version of Nexstar's Brief and Exhibits (ECF Nos. 92, 93.4, 93.5) to remain permanently sealed, and (ii) only the redacted version of Nexstar's Brief and Exhibits (ECF Nos. 94, 95.4, 95.5) to remain on the public docket.

We are available to provide any further information that may aid the Court in its determination of this matter.

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Respectfully submitted,

/s/ Stephen Obermeier
Stephen J. Obermeier (*pro hac vice*)

Counsel for Mission Broadcasting, Inc.

cc: All counsel of record (via ECF)